UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION Master File No. 2:12-MD-02327 MDL No. 2327

Wave 9

THIS DOCUMENT RELATES TO:

WAVE 9 CASES LISTED ON PLAINTIFFS' EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES REGARDING CHRISTINA PRAMUDJI FOR WAVE 9

Plaintiffs filed a Notice of Adoption [Dkt. 8279] in the Wave 9 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Christina Pramudji, M.D. and Supporting Memorandum from Wave 1 [Dkt. 2035; 2037; 2236].

All of the cases identified on Plaintiffs' Exhibit A have been dismissed without prejudice by Order of the Court. To the extent that any of these cases are revived at a future time, Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Christina Pramudji, M.D. for Ethicon Wave 1 [Dkt. 2153] and Ethicon Wave 2 [Dkt. 2530]. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 and Wave 2 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691) Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4561 william.gage@butlersnow.com

/s/ Susan M. Robinson_

Susan M. Robinson (W. Va. Bar #5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage